

Thomas E. Alborg (*Cal. Bar No. 56425*)  
[talborg@amb-law.com](mailto:talborg@amb-law.com)  
**ALBORG, MARTIN & BUDDE, LLP**  
2121 N. California Boulevard, Suite 1010  
Walnut Creek, CA 94596  
925-939-9880 Telephone  
925-939-9915 Facsimile

John Yanchunis (*Pro Hac Vice*)  
[jyanchunis@forthepeople.com](mailto:jyanchunis@forthepeople.com)  
**MORGAN & MORGAN, P.A.**  
201 N. Franklin Street, 7<sup>th</sup> Floor  
Tampa, FL 33602  
813-223-5505 Telephone  
813-223-5402 Facsimile

*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

GREGORY R. RAIFMAN and SUSAN RAIFMAN, husband and wife, individually and on behalf of their marital community and as Trustees of the RAIFMAN FAMILY REVOCABLE INTER VIVOS TRUST and as beneficiaries of the PALLADIAN TRUST, and as sole members of GEKKO HOLDINGS, LLC; EDWARD and LORRAINE KURATA, as husband and wife; JAMES LOOMIS; JEFFREY CHOU; and BRUCE CARDINAL, as Trustee of the ROBERT J. CARDINAL GRANDCHILDREN'S TRUST, and the MARION I. CARDINAL TRUST, and as Managing Member of REDBIRD INVESTMENT GROUP, LLC.,

Plaintiffs,

vs.

WELLS FARGO ADVISORS, LLC, successor in interest to WACHOVIA SECURITIES, LLC; and WACHOVIA SECURITIES, LLC,

Defendants.

Tod Aronovitz (*Pro Hac Vice*)  
[ta@aronovitzlaw.com](mailto:ta@aronovitzlaw.com)  
Barbara Perez (*Pro Hac Vice*)  
[bp@aronovitzlaw.com](mailto:bp@aronovitzlaw.com)  
Andrew Zelmanowitz (*Pro Hac Vice*)  
[az@aronovitzlaw.com](mailto:az@aronovitzlaw.com)  
**ARONOVITZ LAW**  
2 South Biscayne Boulevard, Suite 2630  
Miami, FL 33131  
305-372-2772 Telephone  
305-397-1886 Facsimile

Brian G. Isaacson (*Pro Hac Vice*)  
[briani@isaacsonlawfirm.com](mailto:briani@isaacsonlawfirm.com)  
**ISAACSON LAW FIRM, P.L.L.C.**  
701 Fifth Avenue, Suite 4200  
Seattle, WA 98104  
206-448-1011 Telephone  
206-448-1022 Facsimile

Case No.: No. C 11-02885 SBA

**PARTIES' STIPULATION TO EXCEED  
PAGE LIMIT AS TO PLAINTIFFS'  
RESPONSE IN OPPOSITION TO  
MOTION TO DISMISS THIRD  
AMENDED COMPLAINT**

Action filed: April 1, 2011

[Removed from California State Court]

Hon. Sandra B. Armstrong

1           Whereas, on May 5, 2013, Defendant filed its Motion to Dismiss Plaintiffs' Third  
2 Amended Complaint [Dkt. 155] in this action;

3           Whereas, Plaintiffs' response in opposition to said motion is due on May 29, 2013; and

4           Whereas, Plaintiffs believe they need more than the 15 pages permitted by this Court's  
5 Standing Order to fully and properly address all issues raised in Defendant's motion.

6           NOW, THEREFORE, the parties, through counsel, hereby stipulate and agree, pursuant  
7 to Local Rule 7-11(a), that Plaintiffs may exceed the 15 page limit of their Response in  
8 Opposition Memorandum by six (6) pages, and file their Response in Opposition  
9 Memorandum not to exceed 21 pages.

10 DATED: May 29, 2013

Tod Aronovitz  
Barbara Perez  
Andrew Zelmanowitz  
ARONOVITZ LAW

11  
12  
13           /s/ Tod Aronovitz

Tod Aronovitz

14  
15           Attorneys for Plaintiffs,  
16 GREGORY R. RAIFMAN, SUSAN RAIFMAN  
17 GEKKO HOLDINGS, LLC, and  
HELICON INVESTMENTS, LTD.

18 DATED: May 29, 2013

19 Ronald E. Wood  
Jennifer L. Roche  
20 PROSKAUER ROSE LLP


21           /s/ Ronald E. Wood

Ronald E. Wood

22  
23           Attorneys for Defendant,  
24 WACHOVIA SECURITIES, LLC  
25  
26  
27  
28

1 PURSUANT TO STIPULATION, IT IS SO ORDERED

2 DATED: 5/31/13

3   
4 Hon. Sandra J. Armstrong  
5 United States District Judge  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28